RE: PCO-IAS Request

From: s.38 (FINTRAC/CANAFE)" <s.38 @fintrac-canafe.gc.ca>
To: s.38 (FINTRAC/CANAFE)" <s.38 @fintrac-canafe.gc.ca>
Date: Mon, 14 Feb 2022 20:26:48 +0000

Hi s.38 will you be sharing the bullets and chart with Intel?
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From: s.38 (FINTRAC/CANAFE) <s.38 @fintrac-canafe.gc.ca>
Sent: February 14, 2022 10:25 AM
To: s.38 (FINTRAC/CANAFE) <s.38 @fintrac-canafe.gc.ca>; s.38 (FINTRAC/CANAFE) <s.38 @fintrac-canafe.gc.ca>
Cc: s.38 (FINTRAC/CANAFE) <s.38 @fintrac-canafe.gc.ca>
Subject: RE: PCO-IAS Request
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Absolutely.
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s.38
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From: s.38 (FINTRAC/CANAFE) <s.38 @fintrac-canafe.gc.ca>
Sent: February 14, 2022 10:22 AM
To: s.38 (FINTRAC/CANAFE) <s.38 @fintrac-canafe.gc.ca>; s.38 (FINTRAC/CANAFE) <s.38 @fintrac-canafe.gc.ca>
Cc: s.38 NTRAC/CANAFE) <s.38 @fintrac-canafe.gc.ca>
Subject: RE: PCO-IAS Request
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Thanks for sharing s.3 , just to add, we'd really appreciate seeing what you guys pull together via OSINT. Could be useful to send around for information to our crew.
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From: s.38 (FINTRAC/CANAFE) <s.38 @fintrac-canafe.gc.ca>
Sent: February 14, 2022 10:16 AM
To: s.38 (FINTRAC/CANAFE) <s.38 @fintrac-canafe.gc.ca>; s.38 (FINTRAC/CANAFE) <s.38 @fintrac-canafe.gc.ca>
Cc: s.38 (FINTRAC/CANAFE) <s.38 @fintrac-canafe.gc.ca>
Subject: PCO-IAS Request
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Hi, s.38
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I would keep it high level at this time and base it mainly on Barry's testimony. You rightly added that, while STR reporting has been limited, it can be informed by adverse media reporting (i.e. RE client is subject to adverse media within context of this current event, which may trigger an internal review that could lead to potential submission of STR based on suspicions of ML/TF).
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Thanks!
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s.38
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From: s.38 (FINTRAC/CANAFE) s.38 @fintrac-canafe.gc.ca>
Sent: February 14, 2022 10:11 AM
To: s.38 (FINTRAC/CANAFE) <s.38 @fintrac-canafe.gc.ca>; s.38

(FINTRAC/CANAFE) s.38 @fintrac-canafe.gc.ca>
Cc: s.38 (FINTRAC/CANAFE) s.38 @fintrac-canafe.gc.ca>
Subject: PCO-IAS Request
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Good morning Irrele
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PCO-IAS (Intelligence Assessment Secretariat) is inquiring about the financing related to the convoy. We intend to point them to relevant OSINT, but I wanted to be able to characterize the reporting we are receiving.
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On the basis of Barry's testimony before committee and conversations last week, would it be fair to note:
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> Reporting entities (e.g., bank, virtual currency exchanges, money services businesses) must submit a Suspicious Transaction Report to FINTRAC in respect of a financial transaction that occurs or is attempted, and for which there are reasonable grounds to suspect that the transaction is related to the commission or attempted commission of a money laundering or terrorist activity financing offence. These have no monetary threshold. To date, Suspicious Transaction Reporting related to the convoy and its protests has been limited and informed by adverse media reporting.

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From there we'd point to OSINT material or analysis based on OSINT for the high-level financing piece.
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Let me know if there is something more you want to add/expand or nuance on the FINTRAC reporting piece. Obviously want to keep it high-level and respect the 58(3) limitation on not identifying entities about whom a report is made or the reporting entity who submitted a report.
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s.38
Strategic Intelligence, Research and Analytics (SIRA) Unit
Financial Transactions and Reports Analysis Centre of Canada
s.38 @fintrac-canafe.gc.ca
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L'Unité de renseignements stratégiques, recherche et analytique (RSRA)
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